

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION**

DEVON CURTIS, individually and)	
on behalf of a class of similarly situated)	
individuals,)	
)	
<i>Plaintiff,</i>)	No. 21-cv-06079
)	
v.)	
)	Hon. Steven C. Seeger
7-ELEVEN, INC.,)	
a Texas corporation,)	Hon. Jeannice W.
)	Appenteng
)	
<i>Defendant.</i>)	

JOINT STATUS REPORT

Pursuant to this Court’s November 21, 2023 Minute Entry (Dkt. 66), the Parties provide the following Joint Status Report:

1. On November 20, 2023 the Court granted Plaintiff’s Motions to Compel and ordered Defendant to: (1) produce nationwide purchase data responsive to Plaintiff’s Interrogatory No. 11 and Request for Production No. 20, and (2) to produce a 30(b)(6) witness to testify regarding Topic Nos. 7–10 in Plaintiff’s 30(b)(6) notice of deposition. (Dkt. 65.)
2. Pursuant to the Court’s November 21, 2023 Minute Order, Defendant was to produce the nationwide sales data by December 11, 2023, and the Parties were to meet and confer to schedule the 30(b)(6) deposition before the end of the year.
3. On December 11, 2023 Defendant produced to Plaintiff the nationwide sales data responsive to Plaintiff’s Interrogatory No. 11 and Request for Production No. 20.
4. In addition, the Parties have met and conferred and Defendant has proposed to Plaintiff that in lieu of producing a witness it will produce documents and responsive information identifying all “24/7 Life” and “7-Select” products that are currently accessible within its inventory. Defendant has also agreed to produce labeling and RIC code information for any products within that inventory

list that the Parties agree may potentially fall within the class definition. Defendant has also agreed to produce nationwide sales data for any products that are ultimately determined to be within the class definition. Plaintiff agrees that proceeding in this manner would be more efficient and more likely to produce the responsive information that Plaintiff ultimately sought through her motion to compel than proceeding with a deposition.¹

5. The Parties will work expeditiously to produce the relevant information described above so that Plaintiff may comply with the current January 31, 2024 deadline to move for class certification.

Dated: December 11, 2023

By: /s/Eugene Y. Turin

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¹ To the extent that the Parties come to a disagreement about the production of documents relating to any particular product identified by Defendant, Plaintiff reserves the right to seek this Court's intervention to resolve any dispute.

Certificate of Service

I hereby certify that on December 11, 2023, I electronically filed the foregoing *Joint Status Report* with the Clerk of the Court using the CM/ECF system. A copy of said document will be electronically transmitted to all counsel of record.

Dated: December 11, 2023

By: /s/Eugene Y. Turin
Eugene Y. Turin